

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
SOUTHEASTERN DIVISION

MIKELA JACKSON, and)
JEAN KELLY,)
Plaintiffs,)
vs.) Cause No.: 1:22-cv-00110-AGF
CITY OF SIKESTON, et al.,)
Defendants.)

ALL DEFENDANTS' OBJECTIONS AND RESPONSES TO
PLAINTIFFS' SECOND SET OF REQUESTS FOR PRODUCTION

COME NOW All Defendants, by and through undersigned counsel, and pursuant to Fed. R. Civ. P. 34, object and respond to Plaintiffs' Second Set of Requests for Production as follows:

REQUESTS

Please provide any and all documents in any way relating to the incident complained of herein, including but not limited to the following:

1. Any and all landline and cell phone records (including both cell phones provided by the City and personal cell phones) for each of the named defendants, including incoming and outgoing phone calls and incoming and outgoing text messages from April 29, 2020 through May 2, 2020. In the alternative, each defendant may complete and sign the attached telephone records authorization form.

RESPONSE: OBJECTION, not relevant or reasonably calculated to lead to the discovery of admissible evidence. Also, vague, ambiguous, and overly broad. In addition, invades the parties' reasonable expectation of privacy. Also, requests documents protected by attorney-client privilege and work-product doctrine. Further, this request seeks documents protected by various applicable privileges and laws, including, but not limited to, the Deliberative Process Privilege, Law Enforcement Privilege, Law Enforcement Investigatory Privilege (5 U.S.C. § 552(b)(7)), and the Privacy Act of 1974.

2. Any and all emails sent and received by any of the named defendants and any member of the City of Sikeston DPS that in any way relate to Denzel Taylor.

RESPONSE: OBJECTION, not relevant or reasonably calculated to lead to the discovery of admissible evidence. Also, vague, ambiguous, and overly broad. In addition, invades the parties' reasonable expectation of privacy. Also, requests documents protected by attorney-client privilege and work-product doctrine. Further, this request seeks documents protected by various applicable privileges and laws, including, but not limited to, the Deliberative Process Privilege, Law Enforcement Privilege, Law Enforcement Investigatory Privilege (5 U.S.C. § 552(b)(7)), and the Privacy Act of 1974.

3. Any and all text messages sent and received by any of the named defendants and any member of the City of Sikeston DPS that in any way relate to Denzel Taylor.

RESPONSE: OBJECTION, not relevant or reasonably calculated to lead to the discovery of admissible evidence. Also, vague, ambiguous, and overly broad. In addition, invades the parties' reasonable expectation of privacy. Also, requests documents protected by attorney-client privilege and work-product doctrine. Further, this request seeks documents protected by various applicable privileges and laws, including, but not limited to, the Deliberative Process Privilege, Law Enforcement Privilege, Law Enforcement Investigatory Privilege (5 U.S.C. § 552(b)(7)), and the Privacy Act of 1974.

4. Any and all documents and materials in your possession indicating that D.T., A.T., and B.T. and are not Denzel Taylor's biological children.

RESPONSE: OBJECTION, not relevant or reasonably calculated to lead to the discovery of admissible evidence. Also, vague, ambiguous, and overly broad. Furthermore, it is Plaintiffs' burden to prove the minor children D.T., A.T., and B.T. are the biological children of Denzel Taylor. It is not Defendants' burden to prove they are not.

5. Any and all documents and materials in your possession you have gathered in response to any authorization provided to you and signed by either plaintiff.

RESPONSE: None.

Respectfully submitted,

GOLDBERG SEGALLA LLP

By: /s/ David P. Renovitch

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Broom.*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was served via electronic mail to Melissa Donlon of Donlon Brand, LLC, at melissa@donlonbrand.com, attorneys of record for Plaintiff, this 19th day of July, 2023, upon all counsel of record.

/s/ David P. Renovitch